

Davis Polk

Amelia T.R. Starr
+1 212 450 4516
amelia.starr@davispolk.com

Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017
davispolk.com

Via Electronic Docket

January 24, 2023

Re: Royal Borough of Kensington & Chelsea v. Tara Banfa-Louis, No. 22-cv-8303 (PKC)

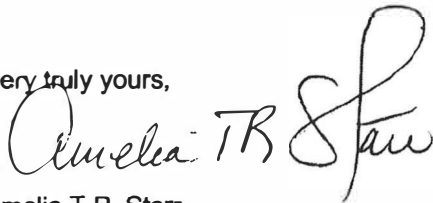
The Hon. P. Kevin Castel
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Dear Judge Castel:

As directed by the Court, I write to respectfully request the sealing of Petitioner's Exhibit 18, which contains text messages to and from our client CB-L, a minor child. The text messages are of a sensitive nature and sealing is warranted to protect the privacy and wellbeing of our client. See *United States v. Amodeo* ("Amodeo I"), 44 F.3d 141, 146-47 (2d Cir. 1995) (providing that access to judicial documents may be restricted where a party's interests in preventing disclosure outweigh those of the public in gaining access). Indeed, "family affairs" are "traditionally considered private rather than public," which "weigh[s] more heavily against access." *Roberts v. Lederman*, No. 04-cv-00033, 2004 WL 2238564, at *7 (E.D.N.Y. Oct. 4, 2004) (quoting *United States v. Amodeo* ("Amodeo II"), 71 F.3d 1044, 1051 (2d Cir. 1995)).

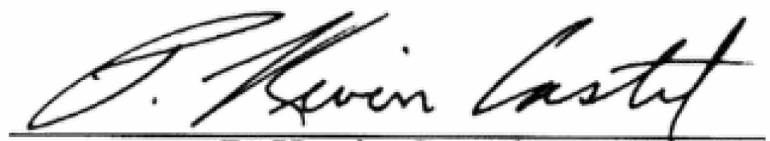
Thank you for your consideration of this request.

Very truly yours,



Amelia T.R. Starr

Application GRANTED.
SO ORDERED.
Dated: 1/24/2023


P. Kevin Castel
United States District Judge